

April 15, 2002

MAY 14 2002

National Organic Standards Board
c/o Katherine Benham
Room 4008-South Building
1400 Independence Ave., SW
Washington DC 20250-0001

To the National Organic Standards Board and members of the National Organic Program,

Please allow me this opportunity to comment on the Access to Outdoors for Poultry issue. It is a fundamental mandate of the OFPA and CFR 205 that livestock living conditions include access to the outdoors. To not require such practice with poultry undermines the very foundation and spirit of organic food production. Consumers expect organic poultry to be raised with access to the outdoors. There will be a credibility backlash if this dual standard is allowed. Organic poultry can and must be managed with outdoor access. Avian Influenza fears are unsubstantiated. The Organic Valley Cooperative has never experienced an AI outbreak in their ten year history.

For the sake of organic integrity and for the good of the organic industry use a strict interpretation when applying Outdoor Access to Poultry

Respectfully,

Confinement organic eggs are as
gross as conventional eggs

Get them chickens outside

[Handwritten signature]
[Handwritten signature]
Rebersburg PA
16722

April 15, 2002

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Respectfully,

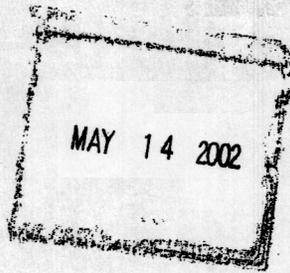
We have cert organic since 1994.

It is very important that poultry have access to outside, it helps to make them healthy & also the meat taste better when the chickens can go outside

Chickens are also alot happier to be outside.

T. Rowen

Rich Long



Twin Oaks Dairy
3175 State Route 13
Truxton, NY 13158-3107
April 30, 2002

National Organic Standards Board
C/o Katherine Benham
Room 4008-South Building
1400 Independence Ave., SW
Washington DC 20250-0001

To the National Organic Standards Board and Members of the National Organic Program,

Both as organic farmers and as organic consumers, we wish to add our voice to the chorus of those asking that the mandate of OFPA and CFR 205 that organic livestock living conditions include access to the outdoors be respected and fully enforced by the NOP. Our specific comment today is in relation to poultry. Access to the outdoors for poultry is such a basic tenet of organic poultry production that not requiring it would be a fundamental abrogation of what certified organic means.

We ask that both the NOSB and the NOP require a strict interpretation of outdoor access for organic poultry.

Sincerely,

Katie Arnold
Richard Arnold
Caraka Arnold
Kirk Arnold

Down to Earth Natural Foods & Lifestyle®

www.downtoearth.org

Corporate Office

P.O. Box 1166
Kailua, HI 96734
Phone: (808) 261-7975
Fax: (808) 261-7969
E-mail: rohan@healthys.net

Locations

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305 Dairy Road
Kahului, HI 96732
Phone: (808) 877-2661
Fax: (808) 877-7548
E-mail: lori@healthys.net

1169 Makawao Ave.

Makawao, HI 96768
Phone: (808) 572-1488
Fax: (808) 572-7910
E-mail: blake@healthys.net

April 29, 2002

National Organic Standards Board
c/o Katherine Benham
Room 4008-South Bldg.
1400 Independence Ave. SW
Washington, D.C. 20250-0001

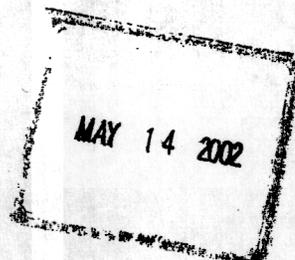
Dear Miss Benham:

I am writing this letter to express Down to Earth Natural Foods' concern about the proposed changes to the National Organic Standards, which would delay the requirement for pasture access for dairy herds and would drop the requirement for access to the outdoors for poultry. Down to Earth Natural Foods is an all-vegetarian, natural foods store, which has six stores located on Oahu and Maui in Hawaii. We are Hawaii's largest retailer of organic foods and produce and are proud members of the both the Hawaii Organic Farmers Association (HOFA) and the Organic Trade Association (OTA).

We have been looking forward to October 2002 when the new national organic standards will go into effect and are strongly opposed to weakening these very important rules, which will help to regulate the organic industry. It is our understanding that the standards stipulate a requirement that all dairy animals over 6 months of age receive a substantial portion of their dry matter needs from pasture. There is speculation that the proposed delay in the rule is actually a first attempt to eliminate the requirement altogether.

We find this delay in the rule to be unacceptable and urge you to reconsider your position. Down to Earth sells a wide variety of organic milk, yogurt, and cheese and we would like to assure our customers that the cows, that provide the milks for our organic dairy products, are being cared for in the best manner possible. In "industrial farms" cattle are confined to spaces where they cannot move and are forced to stand in their own waste. This is inhumane treatment of animals and we hope that the national organic standards will make sure that these cattle will be able graze in open fields in 2003.

Although we are a vegetarian, natural foods store and do not sell poultry, we are definitely concerned about the treatment of chickens. Currently, chickens are confined to incredibly small spaces, where thousands of them are crammed into single buildings. Due to these horrible living conditions, the chickens go insane and



Healthy foods at prices that won't make you sick!

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E-mail: louella@healthys.net

Pearlridge:

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Fax: (808) 488-4549
E-mail: steve@healthys.net

Maui:

305 Dairy Road
Kahului, HI 96732
Phone: (808) 877-2661
Fax: (808) 877-7548
E-mail: lori@healthys.net

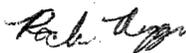
1169 Makawao Ave.

Makawao, HI 96768
Phone: (808) 572-1488
Fax: (808) 572-7910
E-mail: blake@healthys.net

try to peck each other to death. As a way of alleviating this problem, the poultry industry has resorted to clipping the beaks of these animals. However, the living situation of the chickens is not improved by this process and continues to be a breeding ground for bacteria and disease. We think that this is an uncompassionate way of treating our fellow living creatures and ask that you not amend the national organic standards.

Thank you for accepting our comments on this very important matter.

Sincerely,



Rock Riggs
Community Issues Director
Down to Earth Natural Foods
rock@healthys.net

Healthy foods at prices that won't make you sick!

Date 4/29/02

National Organic Standards Board
c/o Katherine Benham
Room 4008-South Building
1400 Independence Ave., SW
Washington DC 20250-0001



National Organic Standards Board,

I am writing to express my support for outdoor access in organic poultry production. As a consumer of organic products, I fully expect that all poultry are allowed access to fresh air, sunlight and green forage, weather permitting. Just as ruminant animals like cattle should be allowed access to pasture, poultry need to exhibit their natural behavior and forage and scratch outdoors. Here are some good reasons to make outdoor access mandatory:

- Allows the birds to exhibit natural behaviors.
- Reduces cannibalism and feather picking.
- Consumption of fresh grass can increase CLA (Conjugated Linoleic Acid) and Omega-3 levels in both eggs and meat.
- Eating fresh grass can increase Vitamin A/Beta Carotene levels in eggs.
- Sets the humane treatment standard that consumers expect.

Eliminating outdoor access for organic poultry, or weakening the standard to the point it is meaningless, seems to be largely an effort by the conventional industry to enter organic production without changing their management style. Raising poultry without outdoor access may be easier, but it is not in the best interest of either the birds or the consumer who buys organic poultry products.

Organic farmers have been successfully raising poultry with outdoor access for many years. Please consider the success and experience of these established organic farmers. At a time when acceptance and respect are necessary, the removal of a long-established standard of organic production would be a great blow to the credibility of the new USDA National Organic Standards.

Please keep the outdoor access standard for poultry in the National Organic Standards.

Respectfully submitted,

Name: DAVID NOCK
David Nock

Address: 15 BACK RIVER RD
AMESBURY, MA
01913

Date 5-2-02

National Organic Standards Board
c/o Katherine Benham
Room 4008-South Building
1400 Independence Ave., SW
Washington DC 20250-0001

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Respectfully submitted,

Name:

Eric Lusignea

Address:

21 HAVEN LN.
EXETER, NH. 03833

Date 4/30/02

National Organic Standards Board
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Room 4008-South Building
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Respectfully submitted,

Name:

Richard Wheeler
Richard Wheeler

Address:

81 Niah St. #29
Amesbury, Mass

01913

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Organic poultry can and must be managed with outdoor access. Avian Influenza fears are unsubstantiated. The Organic Valley Cooperative has never experienced an AI outbreak in their ten year history.

For the sake of organic integrity and for the good of the organic industry use a strict interpretation when applying Outdoor Access to Poultry

Respectfully,

Walter Moore

One aspect of organic farming is that we treat animals humanely. This means that all chickens should have access to the outdoors

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May 2 2002

National Organic Standards Board
c/o Katherine Benham
Room 4008-South Bldg.
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To Whom it may concern,

I can not believe that Big Business is trying to limit the access to outdoors for Poultry. And possibly dairy herds. I make a point to buy only this type of food for my family. It seems that we have rights to know how these animals are being treated before we get the food. And to be assured that certain standards are kept in practice. Please help us take a stand with this issue.

- ALLWS ANIMALS TO EXHIBIT NATURAL BEHAVIOR
- REDUCES CANNIBALISM AND FEATHER PICKING
- FRESH GRASS DIET INCREASES CLA (Conjugated Linoleic Acid) AND OMEGA-3 LEVELS IN BOTH EGGS AND MEAT.
- FRESH GRASS INCREASES VITAMIN A/BETA CAROTENE LEVELS IN EGGS
- SETS A STRONG HUMANE TREATMENT STANDARD
- IT IS THE LAW UNDER OFPA AND THE NOP RULE.

Thank you for your time and effort regarding this matter.

Elizabeth Glick
315 Monroe St
Nevada City, CA 95959

Elizabeth Glick

April 15, 2002

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Respectfully,

Jerry Wiebusch

Wiebusch's Valley View Family Farm

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Respectfully,

James L. Byrum

*Poultry was created to enjoy the wonderful outdoors as well
all species were. Factory Farming is motivated by greed
and not part of the natural way of doing farming.*

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Respectfully, *Mark Kruse*



Mark & Marcia Kruse
2601 Lafayette Ridge Dr.
Lansing, IA 52151

I have been farming organically since 1987 and can see the difference in the quality of the crops, the health of the soil and livestock. Please don't let special interest people who support chemical and drug type farming lower organic standards.

*Thank you
Mark*

Lansing, IA 52151
2601 Lafayette Ridge Dr.
Mark & Marcia Kruse

May 4, 2002

MAY 17 2002

Dear Katherine

Organic standards are essential. To weaken them to meaninglessness is destructive. Animals need to experience great health in order to give us healthful food.

When animals are treated to feedlot conditions the fat they store in their bodies becomes the Harmful types your doctor tell you to avoid. When they eat sufficient pasture the fats become healthful. This is the diet animals ate for thousands of years. To assume that we can change it for convenience sake and assume no risk is hubris. All animals raised by none organic, large corporate farms are raised in the worst conditions an animal can survive in long enough to make it to market.

I feel there should be required pasture time for all grazing animals including pigs and chickens as well as the obvious goats and cattle. To allow a door at one end of a room which is never approached by the majority of the animals in the building is not enough. A wild chicken would go outside. A chicken breed for confinement and shear eating power no longer has the sense to survive let along make good diet choices.

Kindness to animals in our keep is only good farming. The american people have the right to choice to support good farming. Your job, as I see it, is to enable this right.

Mussolini once said that Fascism is the working together of corporations and government . Please remember the dream - We the people.....

Sincerely,

A handwritten signature in black ink, appearing to read 'Susanna Cummings', with a stylized flourish at the end.

Susanna Cummings

April 15, 2002

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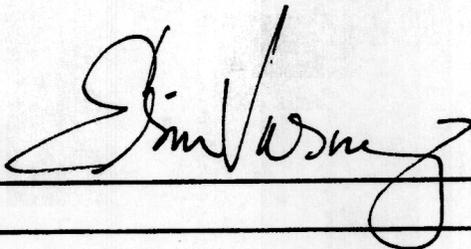
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Respectfully,

ERIN Varney 

* outdoor access for animals is a no-brainer.

No matter what animal we're talking about, not allowing a creature access to sunlight and outdoor play is in-humane and should be a crime.

I have no respect or appreciation for farming practices that go against natural law.

Organic Farming is the RIGHT way to farm --
Please do not undermine the integrity or intelligence of the farmer by allowing this ludicrous issue to pass.

Thank you for your time.